

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

**RECEIVED**

JUL 12 1999

**DOCKET FILE COPY ORIGINAL**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Computer III Further Remand Proceedings:  
Bell Operating Company Provision of  
Enhanced Services

)  
)  
)  
)  
)  
)  
)

CC Docket No. 95-20

1998 Biennial Regulatory Review --  
Review of Computer III and ONA  
Safeguards and Requirements

CC Docket No. 98-10

**OPPOSITION OF SBC COMMUNICATIONS INC.  
TO THE PETITION FOR RECONSIDERATION AND CLARIFICATION  
OF THE COMMERCIAL INTERNET EXCHANGE ASSOCIATION**

SBC Communications Inc. ("SBC"), on behalf of Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, and Nevada Bell, hereby opposes the Commercial Internet Exchange Association's ("CIX's") Petition for Reconsideration and Clarification in so far as it requests that the Commission order the Bell Operating Companies ("BOCs") to post all of their previously approved Comparably Efficient Interconnection ("CEI") plans on the Internet. SBC does not oppose CIX's request that BOCs post information on wire center deployment of Digital Subscriber Loop ("DSL") service, although SBC does not believe a requirement is needed. As CIX notes, SBC does post such information.<sup>1</sup>

---

<sup>1</sup> CIX at 7 and note 12.

**I. The Commission does not, and should not, require BOCs to post previously approved CEI plans on the Internet.**

CIX states that it “believes that it is likely that the Commission intends for RBOCs to web-post all of their CEI plans.”<sup>2</sup> There is no reasonable basis for CIX’s belief. The Commission’s *Report and Order* in this proceeding replaced the pre-approval process with a requirement that BOCs prospectively post their CEI plans on the Internet.<sup>3</sup> Replacing pre-approval eliminates delay in the introduction of new services.<sup>4</sup> Of course, this replacement of pre-approval with Internet posting can by definition only apply to new or amended plans that have not already been approved. Accordingly, the Commission required the BOCs to post “their CEI plan for any new or altered intraLATA information service offering,”<sup>5</sup> not for all existing offerings as CIX argues.

There is no need for the Commission to require Internet posting of previously approved CEI plans. The BOCs’ filings of CEI plans were a matter of public record, and the Common Carrier Bureau issued orders on them, which orders are also a matter of public record. The orders explain in detail what is in each plan, and if a party wants more detail it can obtain the CEI plan from the Commission or by requesting it from the BOC. The fact that CIX may not have participated in the Commission’s CEI plan proceedings, does not justify requiring SBC and the other BOCs to incur the cost and burden of posting the old plans and amendments, most of which SBC no longer has in an electronic format.

---

<sup>2</sup> CIX at 8.

<sup>3</sup> *Report and Order*, para. 19.

<sup>4</sup> *Id.*

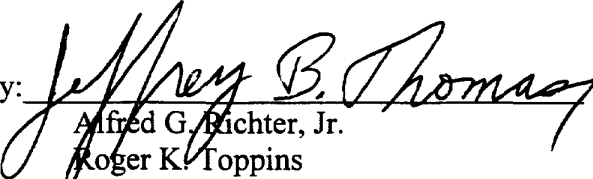
<sup>5</sup> *Id.* at para. 12 (emphasis added).

## II. Conclusion

For the above reasons, the Commission should deny CIX's request that the BOCs be ordered to post their previously approved CEI plans on the Internet.

Respectfully submitted,

SBC COMMUNICATIONS INC.

By: 

Alfred G. Richter, Jr.

Roger K. Toppins

Michael J. Zpevak

Jeffrey B. Thomas

One Bell Plaza, Room 3043

Dallas, Texas 75202

(214) 464-4490

Attorneys for SBC Communications Inc.  
and its Subsidiaries

July 12, 1999

## **CERTIFICATE OF SERVICE**

I, Katie M. Turner, hereby certify that the foregoing, "OPPOSITION OF SBC COMMUNICATIONS INC. TO THE PETITION FOR RECONSIDERATION AND CLARIFICATION OF THE COMMERICAL INTERNET EXCHANGE ASSOCIATION" in CC Docket No. 95-20, CC Docket 98-10 has been filed this 12<sup>th</sup> day of July, 1999 to the Parties of Record.

A handwritten signature in black ink, reading "Katie M. Turner", is written over a horizontal line.

Katie M. Turner

July 12, 1999

PIPER & MARBURY L.L.P.  
SEVENTH FLOOR  
1200 NINETEENTH STREET, N.W.  
WASHINGTON, D.C. 20036